

ROBINS  KAPLAN LLP

800 BOYLSTON STREET
SUITE 2500
BOSTON MA 02199

617 267 2300 TEL
617 267 8288 FAX
ROBINSKAPLAN.COM

MATTHEW M. BURKE
617 859 2711 TEL
MBURKE@ROBINSKAPLAN.COM

January 8, 2020

BY ECF

The Hon. Magistrate Judge Joseph A. Dickson
United States District Court for the District of New Jersey
Martin Luther King, Jr. Building & U.S. Courthouse
50 Walnut Street, Room MLK 2D
Newark, NJ 07101

Re: Lincoln Adventures, LLC v. Those Certain Underwriters at Lloyd's London,
No. 2:08-cv-00235-CCC-JAD

Dear Judge Dickson:

Pursuant to Your Honor's Orders dated September 30, 2019 (Doc. No. 123) and December 3, 2019 (Doc. No. 133), Defendants are due to file their motion for protective order with respect to the Plaintiffs' second set of document requests by January 10, 2020. The parties have conferred on multiple occasions and exchanged correspondence on the issues presented by these document requests. The parties require an additional meet and confer conference that, due to the holidays and other scheduling conflicts, has not yet occurred. The parties request a two-week extension of the deadline for Defendants to file their protective order motion. If this request is granted, Defendants' motion will be due on January 24, 2020, Plaintiffs' opposition will be due on February 24, 2020, and Defendants reply will be due on March 9, 2020.

Counsel for Plaintiffs have seen this letter and consent to the request for extension.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Matthew M. Burke

Matthew M. Burke

cc: All Counsel of Record (via ECF)

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